

WYOCSP | Wyoming Community Services Program

FFY 2015

State of Wyoming
Community Services Block Grant
Application and State Management Plan
- CFDA # 93.569

Federal Fiscal Year 2015
October 1, 2014 – September 30, 2015



Wyoming
Department
of Health

Commit to your health.

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**Community Services Block Grant
Wyoming State Plan FFY 2015
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APPENDICES

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I. FEDERAL FISCAL YEAR

This document is both an Application and State Management Plan (State Plan) for the Community Services Block Grant (CSBG) to the United States Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Office of Community Services (OCS) for Federal Fiscal Year (FFY) 2015 (October 1, 2014 – September 30, 2015). It has been prepared and submitted by the Wyoming Department of Health (WDH), Public Health Division (PHD), Community Services Program (CSP).

II. LETTER OF TRANSMITTAL

A letter addressed to the Director of Office of Community Services, Mr. Seth Hassett, from Mr. Thomas O. Forslund, Director of WDH, is included with this application as Appendix B.

III. EXECUTIVE SUMMARY

A. CSBG State Legislation

Wyoming does not have any statutes specific to CSBG.

B. Designation of Lead State Agency to Administer CSBG

Pursuant to Section 676(a) of the CSBG Act, Governor Matt Mead designated the Department of Health as the State Agency responsible for administering CSBG in Wyoming. The Director of WDH, Thomas O. Forslund, is authorized to sign the assurances and receive the grant award. The current letter of authority, issued by the Governor to Mr. Forslund, is included as Appendix A.

OMB Control Number: 0970-0382
Expiration Date: 8/31/2016

C. Public Hearing Requirements

1. Public Hearing:

Legal notices of local public hearings will be placed in newspapers state-wide prior to implementing FFY 2015 CSBG.

FFY 2015 eligible entities will be required to conduct public hearings in their local geographical areas relative to the use of local CSBG funds for the purpose of soliciting general citizenry input. Such hearings will be advertised in the respective newspapers for at least ten days prior to the scheduled hearing.

The notifications of public hearings, and the conducting of such hearings, are formal requirements of the application process to CSP for CSBG funds. Local applications for CSBG funding provide formal documentation of both the notification of hearings and the proceedings of such hearings.

2. Legislative Hearing:

In accordance with the Federal requirement of Section 676(a)(3) of the CSBG Act, the most recent legislative hearing was held before the Joint Labor Health and Social Services Committee in Cheyenne, Wyoming on December 13, 2012. The next hearing will be in 2015. Documentation is included as Appendix C.

3. Public Inspection of State Plan:

The Public Notice, included as Appendix D, was published in the Casper Star Tribune Newspaper on July 5th, 2014 advising the general public that an electronic draft of the FFY 2015 CSBG State Plan was posted on the WDH, CSP website. CSP also advised all eligible entities to view the document and encouraged anyone with comments or suggestions to provide those in writing by August 2nd, 2014. No comments were received and a public hearing was not requested or held. The final FFY 2015 plan was posted on the WDH, CSP Website August 29, 2014.

IV. STATEMENT OF FEDERAL AND CSBG ASSURANCES

The WDH Director, Thomas O. Forslund, formally signed a letter of federal assurances and certifications to HHS, ACF, OCS for the State of Wyoming's FFY 2015 CSBG (Appendix B). These assurances and certifications (as applicable) will also be a formal requirement for local-level CSBG eligible entities (subgrantees), and service providers, and will serve to establish the overall mission, goals, and objectives of local-level CSBG activities. The State's affirmation that the assurances and certifications' requirements are complied with and carried out will be through the contractual process as well as through monitoring of both state and local-level activities.

V. THE NARRATIVE STATE PLAN

A. Administrative Structure

CSP will only develop regulations, policies, procedures or other requirements absolutely essential and necessary to successfully carry out the provisions of the CSBG Act and the State Plan. Policies and procedures will be issued to local eligible entities and their subcontractors as needed. Such policies will be designed to assist local programs in meeting federal and state requirements. Further, CSP will assure that any federal and/or state regulations adopted affecting local CSBG programs during the grant period are provided to its eligible entities and subcontractors.

1. State Administrative Agency:

The purpose of CSP is to provide assistance to local communities, through a combination of local governments, community action agencies, and a tribal organization for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals to move towards self-sufficiency.

a) Mission Statement:

The mission of the Community Services Program (CSP) is to empower low-income individuals and families to overcome the effects of poverty and to support their progress toward greater self-sufficiency by providing a wide range of services and activities addressing health, nutrition, housing, emergency services, employment, education, and income management in all 23 counties and on the Wind River Reservation through Tripartite Boards, Community Action Agencies, a Tribal Agency, and an abundance of social service providers.

b) Goals:

The goals of CSP are to:

- (1) reduce and/or eliminate the causes of poverty;
- (2) revitalize low-income communities; and
- (3) empower low-income individuals and families to move toward becoming economically self-sufficient.

Objectives:

Objectives established to accomplish the goals of CSBG are:

- (1) to strengthen community capabilities for planning and coordinating the use of a broad range of federal, state, local, and other resources (including the private sector), related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions;
- (2) to organize a range of services and activities related to the needs of low-income individuals and families, so that these services and activities have a measurable impact on the causes of poverty in Wyoming's communities and ultimately help low-income people to achieve self-sufficiency;
- (3) to improve and expand the use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown;
- (4) to maximize participation of residents of low-income communities and members of the groups served by programs assisted through CSBG to empower such residents and members to respond to the unique problems and needs within their communities; and

(5) to broaden and strengthen the resource base of programs directed at eliminating poverty so as to secure a more active role in the provision of services for:

(a) private, religious, charitable, and neighborhood or community-based organizations; and

(b) individual citizens, and business, labor, and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.

2. Eligible Entities:

Only organizations that are formally designated as eligible entities by CSP will be contracted with for administration of local CSBG programs state-wide. CSP will rule on local requests for eligible entity status based on the requirements of the CSBG Act with regard to eligible entities.

State-wide coverage:

The intent of CSP is to continue to have state-wide coverage of CSBG activities and services. The basic philosophy of CSP is that even one unserved or underserved area is one too many.

The designation and/or re-designation in unserved or underserved areas will be accomplished in total compliance with the requirements in the CSBG Act with regard to designation and re-designation in unserved or underserved areas.

Wind River Reservation:

The State, beginning in FFY 1982, began a strong commitment to helping the tragic conditions at the Wind River Reservation, which is primarily inhabited by the Northern Arapaho and the Eastern Shoshone Indian Tribes. Since then, the State has provided CSBG funds to the Tribal governments through a formal application process.

Studies consistently provide evidence that the Wind River Reservation represents an area that is chronically economically depressed. It is characterized by an astoundingly high rate of unemployment, and unusually high needs for services in the areas of health, alcohol and drug abuse, education, quality housing, economic development, sanitation, and related areas.

The general quality of CSBG programs operated by the Tribes is currently very high, but the degree of need, and the current limited resources call for much more commitment from local providers, both public and private, the state, and the Federal Government.

Eligible Entities/Preference:

The CSBG Act compels the State to seek a qualified private non-profit organization as the first option for eligible entity designation. Only in circumstances where no such private non-profit organization may qualify, may the State consider designating a political subdivision or public organization. If a qualified private non-profit organization exists that is interested and has the capacity to administer CSBG, a political subdivision may not be designated. Ultimate decisions regarding eligible entity status remain the responsibility of CSP.

Eligible Entities' Designation and Re-Designation in Unserved Areas:

The legislative history of the CSBG Act emphasizes that it was the intent "that states shall give consideration to using existing, private non-profit eligible entities to provide CSBG services in unserved areas. Utilizing existing eligible entities will effectively leverage CSBG resources and expertise and ensure continuity in the program."

The process also favors existing eligible entities by requiring any private non-profit organization designated as an eligible entity to have demonstrated effectiveness in meeting CSBG's goals and purposes as a Tripartite Board.

Location will be a factor in the selection. CSP may choose among (1) private non-profit organizations (including both current eligible entities and other non-profit organizations, including faith-based) located in unserved or underserved areas and capable of providing a wide range of services designed to eliminate poverty and foster self-sufficiency; and (2) private eligible entities located nearby already providing related services in the unserved or underserved area, but other entities may be selected only if they are located in, rather than just near, the unserved or underserved area. If no private organization is determined to be qualified, the State may designate a local unit of government to serve as the eligible entity if it has a Tripartite Board. The language from the CSBG Act with respect to eligible entities designation and re-designation in unserved areas follows:

- Qualified Organization In Or Near Area: If any geographic area of the state is not, or ceases to be, served by an eligible entity under the Act, and if the State decided to serve such an area, the State may solicit applications from, and designate as an eligible entity-
 - a private non-profit organization (which may include an eligible entity) that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of the Act; and
 - a private non-profit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

In order to serve as the eligible entity for the area, the latter type of eligible entity described shall agree to add additional members to the board of the entity to ensure adequate representation--

- in each of the three required categories described in subparagraphs (A), (B), and (C) of section 676B(a)(2) (Tripartite Boards composition; 1/3 elected public officials or their representatives; 1/3 members who are chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and the remainder are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served. These members must reside in the community comprised by the unserved area; and
- in the category of low-income representatives, the members must reside in the neighborhood to be served.
- No Qualified Organization in Or Near Area: If no private non-profit organization is identified or determined to be qualified in the "Qualified Organization in Or Near Area," category, to serve the unserved area as an eligible entity the State may designate an appropriate political subdivision of the state to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision (local government) shall have a Tripartite Board or other mechanism as required in section 676B(2) of the Act (Tripartite Boards).
- Special Consideration: In designating an eligible entity under the "Designation and Redesignation of Eligible Entities in Unserved Areas," the State shall grant the designation to an organization of demonstrated effectiveness in meeting the goals and purposes of the CSBG Act and may give priority in granting the designation, to eligible entities that are providing related services in the unserved area, consistent with the need identified by a community-needs assessment.

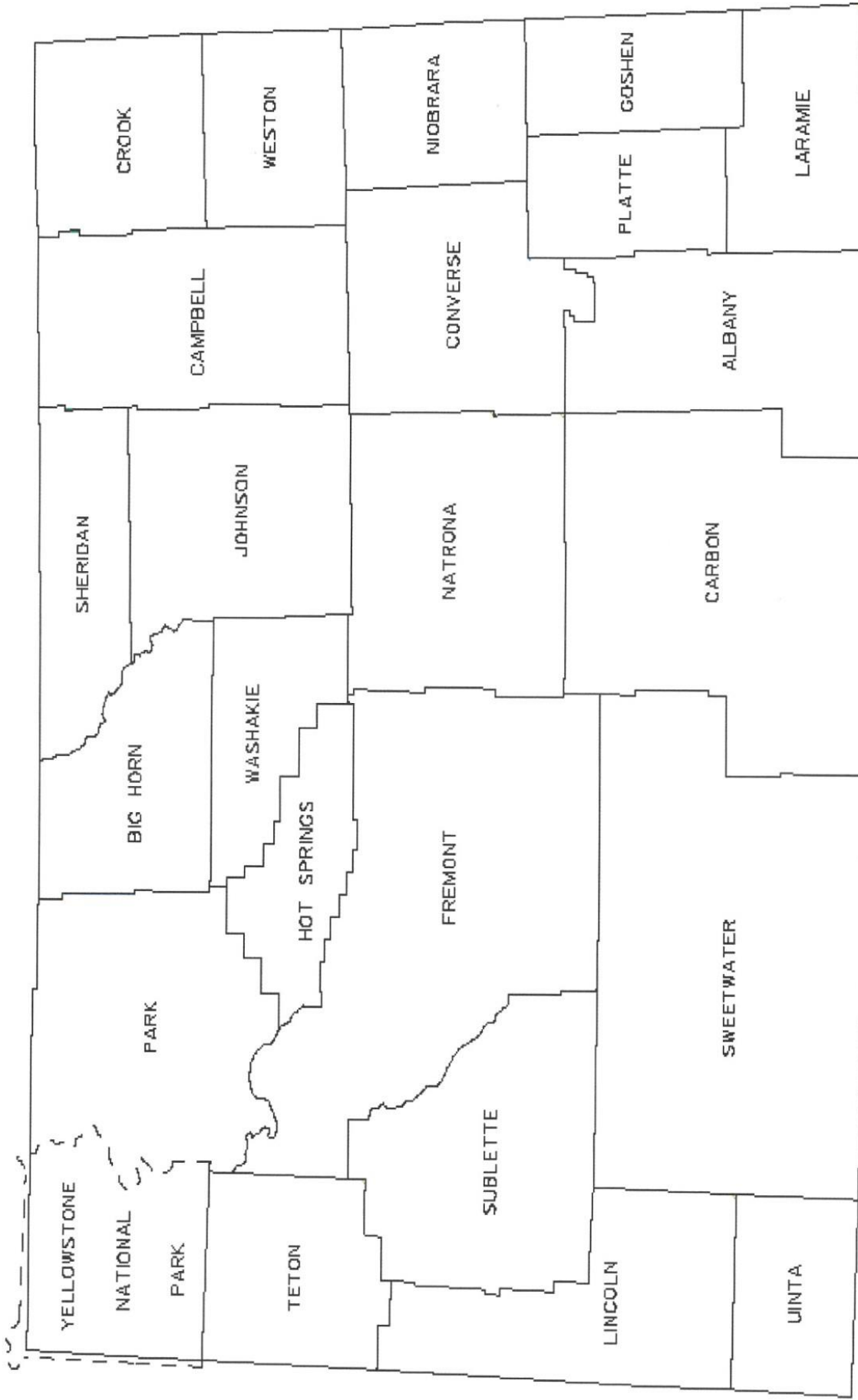
If an existing eligible entity has gone out of business, does not choose to become designated (or re-designated, as appropriate), if CSP has lawfully terminated the entity's CSBG funding, or if a geographic area is not, or ceases to be, served for any other reason; CSP may designate a new "eligible entity" if previous eligible entities cannot, or will not, meet the tripartite governance board requirements, or any requirements in the CSBG Act and State Plan.

A list of the current eligible entities and the geographic area(s) served follows:

<u>Eligible Entity</u>	<u>Type</u>	<u>Geographic Area(s) Served</u>
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CSBG Board of Directors of Albany County	Local Government	Albany County
Campbell County CARE Board	Local Government	Campbell County
Carbon County Community Action Committee	Local Government	Carbon County
Converse County Human Resources Council	Private – Non CAA	Converse County
Crook County Council of County Services	Private – Non CAA	Crook County
Fremont County Action Committee	Local Government	Fremont County
Community Resource Center of Johnson County	Private – Non CAA	Johnson County
Community Action of Laramie County, Inc.*	Private CAA	Laramie County
Community Action Partnership of Natrona County*	Private CAA	Natrona County
Northwest Community Action Programs of Wyoming, Inc.*	Private CAA	Big Horn, Goshen, Hot Springs, Lincoln, Niobrara, Sublette, Weston, & Washakie Counties
Northern Arapaho Human Services Commission	Tribal Organization	Wind River Reservation
Yellowstone Country Assistance Network	Private – Non CAA	Park County
Platte County Tripartite Board	Local Government	Platte County
Sheridan County Tripartite Board	Local Government	Sheridan County
Sweetwater County Tripartite Board	Local Government	Sweetwater County
Teton County Tripartite Board	Local Government	Teton County
Human Services Tripartite Board of Uinta County (* Community Action Agency)	Local Government	Uinta County

In addition to the eligible entities listed above, the Wyoming CSBG system utilizes approximately 150 - 175 service providers/subcontractors; a diverse mix of public and private sector organizations.



3. Distribution and Allocation of Funds:

Not less than ninety percent (90%) of Wyoming's CSBG funds will be available to eligible entities for the provision of local CSBG activities and services. Five percent (5%) is allocated for state level administration. Five percent (5%) is allocated for state-wide training and technical assistance activities. Any unexpended funds from that "five percent component" may be reallocated to eligible entities.

A general FFY 2015 budget with brief budget narratives follows:

CSBG FFY 2015 BUDGET

<u>State level Administration</u>	\$ 175,864.00
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Funds used at the state level for Administration; CSP, PHD, WDH.

<u>Federal Discretionary</u>	\$ 167,070.00
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Including, but not limited to training and technical assistance to eligible entities and subcontractors; coordination of human resources programs both at the state and the local level; analyzation of the distribution of State CSBG funds to determine if funds have gone to areas with the greatest need; supporting innovative programs conducted by eligible entities and other community organizations to eliminate poverty and to promote self-sufficiency and community revitalization; and other activities consistent with CSBG purposes.

<u>Wind River Reservation</u>	\$ 317,434.00
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Tribal Government set-aside because of the unusually high degree of need for CSBG services; part of the 90% Eligible Entity Category.

<u>CSBG Formula Funding</u>	\$2,856,902.00
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Other than the Tribal Component, requested by Tripartite Boards designated as CSBG eligible entities.

Total:	\$3,517,270.00
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The following page reflects the most recent data available used to establish the County Poverty Factors, which essentially translate into fund allocations for the respective jurisdictional areas (i.e., counties).

This is the planned distribution of funds for FFY 2015:

Geographic Area	Low-Income Pop.	% of WY	People Out of Work	% of WY	People on SNAP	% of WY	People on Title XIX	% of WY	People on Power/TANF*	% of WY	Apps rcvd for Asst.	% of WY	People on S.S.I.	% of WY	Poverty Rating	% of CSBG Funds	County Allocation in \$ Dollars
Albany	8,559	12.8	722	5.3	1,937	5.2	3,090	4.6	21	2.4	253	5.1	276	4.1	5.6	5.65	\$161,394
Big Horn	1,375	2.1	292	2.1	363	1.0	1,654	2.4	8	0.9	64	1.3	148	2.2	1.7	1.72	\$49,146
Campbell	3,292	4.9	942	6.9	1,905	5.2	4,807	7.1	23	2.6	292	5.9	283	4.2	5.3	5.26	\$150,416
Carbon	1,988	3.0	376	2.7	1,134	3.1	1,830	2.7	25	2.9	152	3.1	152	2.3	2.8	2.82	\$80,466
Converse	1,316	2.0	258	1.9	730	2.0	1,537	2.3	24	2.8	99	2.0	151	2.3	2.2	2.16	\$61,698
Crook	605	0.9	161	1.2	350	0.9	633	0.9	3	0.3	55	1.1	42	0.6	0.9	0.86	\$24,695
Fremont	6,499	9.7	1,148	8.4	4,303	11.7	8,031	11.9	66	7.6	507	10.3	890	13.3	10.4	10.39	\$296,971
Goshen	2,145	3.2	287	2.1	1,192	3.2	1,884	2.8	36	4.1	126	2.6	235	3.5	3.1	3.07	\$87,791
Hot Springs	552	0.8	114	0.8	410	1.1	728	1.1	2	0.2	56	1.1	92	1.4	0.9	0.94	\$26,864
Johnson	794	1.2	232	1.7	411	1.1	749	1.1	23	2.6	56	1.1	46	0.7	1.4	1.37	\$39,038
Laramie	10,118	15.1	2,230	16.3	7,554	20.5	11,972	17.7	342	39.3	957	19.4	1,488	22.2	21.5	21.49	\$613,992
Lincoln	1,668	2.5	494	3.6	776	2.1	1,692	2.5	3	0.3	93	1.9	134	2.0	2.1	2.13	\$60,955
Natrona	9,595	14.3	1,884	13.8	5,756	15.6	10,208	15.1	120	13.8	811	16.4	1,198	17.9	15.3	15.27	\$436,213
Niobrara	352	0.5	50	0.4	205	0.6	392	0.6	4	0.5	21	0.4	34	0.5	0.5	0.49	\$13,952
Park	3,202	4.8	792	5.8	1,725	4.7	3,101	4.6	45	5.2	216	4.4	265	4.0	4.8	4.76	\$136,027
Platte	1,116	1.7	192	1.4	661	1.8	1,132	1.7	9	1.0	70	1.4	100	1.5	1.5	1.50	\$42,770
Sheridan	3,141	4.7	845	6.2	1,844	5.0	3,094	4.6	68	7.8	290	5.9	309	4.6	5.5	5.53	\$158,086
Sublette	608	0.9	234	1.7	178	0.5	587	0.9	5	0.6	29	0.6	41	0.6	0.8	0.82	\$23,436
Sweetwater	3,741	5.6	1,002	7.3	2,322	6.3	4,564	6.8	21	2.4	339	6.9	347	5.2	5.8	5.77	\$164,932
Teton	1,885	2.8	561	4.1	251	0.7	1,289	1.9	5	0.6	70	1.4	54	0.8	1.8	1.76	\$50,208
Uinta	2,646	4.0	520	3.8	1,595	4.3	2,825	4.2	2	0.2	208	4.2	269	4.0	3.5	3.53	\$100,854
Washakie	993	1.5	221	1.6	610	1.7	1,049	1.6	8	0.9	74	1.5	98	1.5	1.5	1.45	\$41,560
Weston	687	1.0	133	1.0	722	2.0	737	1.1	8	0.9	93	1.9	56	0.8	1.2	1.24	\$35,440
TOTALS	66,877	100	13,690	100	36,934	100	67,585	100	871	100	4,931	100	6,708	100	100	100	2,856,902
Statistic Source	U.S Census & Retrieval Service As Of 12/2012		Wyoming Dept. of Employment As Of 03/2014		Wyoming Dept. of Family Services As Of 03/2014		Wyoming Dept. of Health As Of 03/2014		Wyoming Dept. of Services As Of 03/2014		Wyoming Dept. of Family Svs. As Of 03/2014		U.S. Social Security Admin. As Of 12/2012				* Personal Opportunities with Employment Responsibilities (State) * Temporary Assistance for Needy Families (Federal)
TIME PERIOD																	

B. Description of Criteria and Distribution Formula

As is shown in the preceding table, the most recent low-income data available is used from a number of sources, (1) U.S. Census and Retrieval Service for low-income census counts; (2) Wyoming Department of Employment for number of unemployed people; (3) Wyoming Department of Family Services for people receiving SNAP (Supplemental Nutrition Assistance Program) formerly known as Food Stamps; people receiving Personal Opportunities With Employment Responsibilities (POWER), which is Wyoming's version of the Federal Temporary Assistance for Needy Families (TANF); and applications received for financial and social assistance; (4) Wyoming Department of Health for people receiving Title XIX (Medicaid); and (5) U.S. Social Security Administration (people receiving Social Security Insurance).

The base of the current formula is the number of people:

1. considered low-income (as defined by the 100% Federal Poverty Guidelines) within each geographic jurisdiction (counties), or simply, the percent (by county) of the total state low-income population;
2. unemployed in each county, and percent of the state's unemployed;
3. receiving SNAP in each county, and percent of the state's SNAP total;
4. on Title XIX (Medicaid) in each county, and the percent of the state's total;
5. on POWER, and the percent of the state's total;
6. who submitted applications for financial and/or social services assistance by the Department of Family Services in each county, and the percent of the state's total; and
7. receiving Social Security Insurance (all categories) in each county, and the percent of the state's total.

These seven factors, or variables, are then averaged into a "County Poverty Factor," which translates to each county's percent of the funds available in that county for CSBG activities and services.

Wind River Reservation Funding:

Ten percent (10%) is set aside for Wind River Reservation programs. Because of the relatively small number of Native American people, compared to the overall state population, if the funding distribution formula were used for their allocation (as with counties) the tribes would receive such small amounts that CSBG would not be of much benefit to the Native American population. The needs of the Native American population in Wyoming are significantly more than the general and low-income population.

Funding Limitations:

Construction: CSBG funds may not be used, without a waiver from HHS/OCS, for the purchase or improvement of land, or the construction, or permanent improvement of any building or facility. Funds may be used for low-cost weatherization, home rehabilitation, or other energy-related home repairs only for the low-income population.

Political Activity: CSBG-funded programs may not participate in any political activity connected with an election for public or political party office, including voter registration activity or transportation to the polls or other similar assistance to voters or prospective voters.

Employees of any entity which receives CSBG funds may not: (1) use their official authority or influence to interfere with or affect the result of an election or a nomination for office; or (2) coerce, command, or advise a state or local officer or employee, or another employee of a CSBG-funded entity, to pay, lend, or contribute anything of value to any person or entity (including a political party) for political purposes. Also, employees of any entity which receives CSBG funds, and plans, develops, and coordinates CSBG activities (CSBG coordination entities), which presumably means most community action agencies, and similar-type groups, may not be a candidate for partisan elective office (i.e., as a representative of a political party). Such restrictions do not bar employees from voting as they choose or expressing their opinions on political subjects or candidate, as long as those opinions are not identified with CSBG-funded programs.

C. Description of Distribution and Use of Restricted Funds

The State may recapture and redistribute funds distributed to an eligible entity that are unobligated by the 4th quarter if such unobligated funds exceed 20% of the amount distributed to an eligible entity for the FFY.

In redistributing the funds captured, the State will redistribute such funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private non-profit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the CSBG.

D. Description of Distribution and Use of Discretionary Funds

Five percent (5%) of the State's CSBG funds are set aside for activities state-wide that are distinct from the other 90% of its funds allocated to local CSBG eligible entities (subgrantees) and subcontractors. The amount that is projected to be unexpended in this category will be reallocated to eligible entities in the "90%" category.

Preliminary planning and analysis based primarily on the requirements of the CSBG Act indicate that such state-wide activities may include (but are not limited to):

1. Training and technical assistance to local eligible entities and related organizations; particularly in the areas of establishment and operation of tripartite governance boards, Results Oriented Management and Accountability (WyoROMA) systems, Community Action Plans, Needs Assessments, Information Systems (IS) Survey Report, and related administrative and program areas;
2. Coordinating state-operated programs and, at the option of the state, local programs, serving low-income children and families with services provided by eligible entities and subcontractors;
3. Supporting state-wide coordination among eligible entities and subcontractors;
4. Supporting individual development account and other asset-building programs;
5. Analyzing distribution of State CSBG funds to determine if funds have gone to areas with the greatest need; and
6. Supporting other activities consistent with the purposes of the CSBG.

E. Description of Use of Administrative Funds

Five percent (5%) has been allocated for administration for state level purposes. The State will not expend more than 5% for administration. CSBG administrative funding currently provides for one full-time CSP Manager Position and forty percent (40%) of the Rural and Frontier Health (RFH) Unit Manager Position. The CSP Manager is responsible for all aspects of the program including, but not limited to, day-to-day operations of the program, determining funding allocations, preparing the State Plan, reviewing sub-grantee applications, writing contracts, reviewing monthly reports, monitoring of the State's CSBG subgrantees, and compiling and submitting the required federal reports. The RFH Unit Manager oversees the Community Services Program, the End Stage Renal Disease Program, the Office of Multicultural Health and the Office of Rural Health, all of which also benefit low-income individuals across the state.

Administrative Costs:

HHS, OCS defines "direct" program and "administrative" costs in accordance with three criteria: (a) meeting Congressional intent for the program; (b) achieving consistency with HHS audit and financial management standards; and (c) ensuring a common basis for relating expenditures to CSBG Results Oriented Management and Accountability (ROMA) System or, in Wyoming's case, *WyoROMA*.

CSBG funds may be used to undertake a very broad range of activities, including linking and strengthening other anti-poverty programs and services. For example, CSBG funds may support planning, coordination, and capacity-building to improve the effectiveness

of other community programs and organizations. CSBG funds may also be used to enhance and supplement other federally funded programs, but not to supplant other funds from any source.

The following represents definitions of the CSBG direct program and administrative costs.

“Direct” Program Costs for CSBG Reporting. Direct program costs can be identified with delivery of a particular project, service, or activity intended to achieve an objective of the grant award. For CSBG, those purposes and eligible activities are specified in the reauthorizing statute, reflected in the national ROMA performance measures, and further specified in the Wyoming State CSBG Plan. Direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts, as long as those expenses relate specifically to a particular program or activity, but not to the general administration of the organization.

“Administrative” Costs for CSBG Reporting. In the context of CSBG statutory reporting requirements, administrative costs are equivalent to typical indirect costs or overhead. As distinguished from program administration or management expenditures that qualify as direct costs, administrative costs refer to central executive functions that do not directly support a specific project or service. Administrative costs incurred for common objectives that benefit multiple programs administered by the grantee organization (or the organization as a whole) are not readily assignable to a particular program funding stream. Rather, administrative costs relate to the general management of the grantee organization, such as strategic direction, board development, Executive Director function’s, accounting, budgeting, personnel, procurement, and legal services.

F. State Community Services Program Implementation

(1) Program Overview:

This Plan delineates the manner in which funds will be expended, how the program will be administered, how all of the federal assurances, certifications and other requirements will be carried out, as well as other pertinent information.

The CSBG Act, since its inception in 1982, has provided for the shift of primary responsibility of community low-income human services programs from the federal to the state level. The original Act (P.L. 97-35) replaced anti-poverty programs previously authorized under the Economic Opportunity Act by the U.S. Community Services Administration, and assigned funds for the programs to the HHS, OCS, to make grants available through the block grant concept to states for their use in eliminating poverty and related conditions.

Public Law 97-35 has been subsequently amended many times through the years since it was originally passed into law in 1981, with changes being relatively minor in nature. The revised CSBG Act, which became effective on October 27, 1998 preserves the fundamental goals and structure of the program, in particular the essential role of community action agencies. Some significant changes have been made, however, both in substance and in the organization of the statute.

The State, its grantees (eligible entities), and subcontractors will use the most current poverty guideline definition as promulgated by HHS, and published in the U.S. Federal Register to establish eligibility for CSBG services. Essentially, the term "poverty line" means the official poverty line defined by the most recent data available from the U.S. Census Bureau. HHS/OCS revises annually the poverty line, which is used as a criterion of eligibility in the CSBG. The current poverty guidelines are the amounts to be used to determine eligibility for FFY 2015 regardless of any updates.

Tripartite Boards may, at their discretion, allow specific areas whose economies cause a hardship for low-income people at the 100% level to increase that level not to exceed 125% of the official poverty line. Such discussion should include recognition that CSBG funding is limited and often insufficient to make a major impact on poverty reduction in a community; and that increasing the eligible population creates a risk of leaving the neediest with too small a pool of available money to meet their basic needs. Any Tripartite Board adopting the practice of increasing the poverty line as noted above, must notify CSP of its decision, and include the rationale for making that decision as part of the Tripartite Board's minutes for review by any interested party.

a) The Service Delivery System:

A description of the State of Wyoming's CSBG service delivery system is essentially comprised of (1) activities and services to be performed and provided; (2) the service providers utilized, i.e., eligible entities and subcontractors; and (3) the geographic areas of the state for CSBG activities. A description of the first two categories follows. The geographic areas served are detailed in a prior section, located on page 7.

Activities and Services:

Activities and services provided in Wyoming's CSBG Program reflect the needs of low-income individuals and families. Such needs are determined primarily by the low-income people themselves via (1) their input from their representation on eligible entity tripartite governance boards, (2) local and state level public hearings, (3) the best and most recent available poverty information, (4) data and information derived from local needs assessments which will be conducted in each geographical area, and (5) input from local and state level human services providers, along with other information from

knowledgeable individuals and organizations relative to the poor.

The intent is to use the funds provided to CSBG eligible entities and subcontractors to increase the level of services and activities or to increase the types of services and activities provided to the poor, including youth and elderly, and not be used to replace previous appropriations of local funds for these purposes. The State will not allow the supplanting of other funds with CSBG funds.

(1) Funds made available through the CSBG will only be used:

(a) to support activities that are designed to assist low-income individuals and families, including people receiving assistance under Part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless individuals and families, migrant or seasonal farm workers, and elderly low-income individuals, to:

(i) remove obstacles and solve problems that block the achievement of self-sufficiency, (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

(ii) secure and retain meaningful employment;

(iii) attain an adequate education, with particular attention toward improving literacy skills of the low-income families, which may include family literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;

(iv) make better use of available income;

(v) obtain and maintain adequate housing and suitable living environment;

(vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and

(vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots